



June 2007

Information Request Questions: Owners/Operators – PCB Sites

1. Has any equipment or material owned or used by Company X ever been sold to, supplied to, or otherwise turned over to Company Y for scrapping or salvage or any other purpose?
2. Has any equipment or material owned or used by Company X ever been brought to the Site for salvage, dismantling, or any other purpose?
3. If your answer to either question or both, is yes, provide a complete list of all such material and equipment, as well as any and all shipments thereof; include the following information with your response:
 - a. The approximate date(s) the material or equipment was taken out of service, and the date(s) scrapped, disposed of, or otherwise turned over to Company Y, or the date taken to the Site, if applicable. For each material which was scrapped at your facility, indicate where and how the material was ultimately disposed of.
 - b. For each item of material or equipment, indicate whether it was oil filled when in use. Supply any and all records that may indicate the contents of the oil, in particular whether the oil may have contained PCBs. Briefly indicate what steps were taken to determine whether the oil contained PCBs at the time of taking out of service or of disposal, and explain what precautions were taken to ensure that any PCBs contaminating the equipment were disposed of properly.
 - c. Supply all documents pertaining to the transaction, and to the movement or shipment of the equipment or material from your property, or from property where you operate.
 - d. For each instance of equipment or material taken from your property (or from property operated by Company X), indicate whether the equipment or material was transported by Company Y, or by a separate company. In the case of the latter, identify both the individual and the company supplying the transportation services.
4. Provide names, addresses, and telephone numbers of companies employed to repair transformers, capacitors, or other electrical equipment.
5. Describe all records now or formerly in the possession of Company X relating to the information requested above.
6. Provide the location(s) of the records. If any such records have been destroyed, provide the dates of destruction.
7. Has Company X ever shipped transformers or any other oil filled electrical equipment to the Site?
8. If so, provide the following details for each item that was or may have been sent to the Site:
 - a. the name of the manufacturer and serial number;
 - b. the quantity of oil contained in the equipment;
 - c. the concentration of PCBs contained in the oil;
 - d. the purpose of the shipment (i.e., repair or resale);
 - e. the date on which the equipment left your facility;
 - f. the time period which the equipment remained at the Site;
 - g. the company name, address, and telephone number of the transporter; and
 - h. the names, addresses, telephone numbers, and dates of ownership of any and all prior owners.
9. Has Company A ever received transformers or any other oil filled electrical equipment from Company B? If so, provide the following details for each item that was received from Company B:
 - a. the name of the manufacturer and serial number;
 - b. the quantity of oil contained in the equipment;
 - c. the concentration of PCBs contained in the oil;

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- d. the purpose of the shipment;
 - e. the date on which you received the equipment;
 - f. the current location of the equipment (if sold to another party, provide the name, address, and telephone number of the current owner).
 - g. the names, addresses, telephone numbers, and dates of ownership of any and all prior owners.
 - h. the name, address, and telephone number of the transporter who delivered the equipment to your facility.
10. Provide legible copies of any and all contracts, invoices, receipts, or other documents describing the transactions that Company A implemented with Company B for each item identified in the question above.
11. Provide legible copies of any and all contracts, invoices, receipts, or other documents related to the transaction that Company B implemented with transporters to transport the items in the question above.
12. Describe any knowledge of the practices of the owner or operator of the site in regard to the destruction or disposal of any material or substance containing any concentration of PCBs.
13. Describe how both PCB contaminated oil and uncontaminated oil were emptied from electrical transformers and capacitors or other electrical equipment and stored onsite. List materials or equipment that came in contact with PCB oil.
14. Describe the procedure for cleaning equipment before repairs were made.
15. Describe the containers in which PCB oils and spent cleaning fluids were stored. Where were these containers located onsite?
16. List the number of PCB containing transformers, capacitors, and any other electrical equipment that have been repaired or otherwise serviced as well as the volume of PCB oil handled by Company A. Please provide these figures in yearly estimates.
17. Describe any waste treatment and disposal methods of used oil and discarded components of transformers and capacitors. Specify how PCB oil storage containers were disposed of when no longer used.
18. Provide dates of any known releases of oil that contained or may have contained PCBs and any waste oil as well as respective quantities released and measures to recover or cleanup the oil. In addition, provide names of individuals present when such releases occurred. State whether releases were reported to local, state, or federal officials. If so, provide the name and address of the official or agency and any action taken by the official or agency. For purposes of this request, "release" refers to any spillage, leaking, dumping, pouring, pumping, discharge, emitting, emptying, escaping, or disposal into the environment.
19. If not already answered in response to the above requests, provide the following information regarding PCB oil and waste oil:
 - a. the time period over which such wastes were generated (i.e., not replaced in repaired transformers, capacitors, or other electrical equipment);
 - b. the quantity (weight or volume) of PCB and waste oil generated or handled;
 - c. description of past and present procedures used for handling and storage of hazardous substances at the Site, and
 - d. description (locations and amounts) of known releases of hazardous substances or wastes at the Site.
20. If available to you, supply a summary of all transactions of the companies or businesses at the site in which items were purchased or otherwise obtained which might have contained PCBs or had PCBs on their surfaces. Provide the following information for each transaction:
 - a. the item purchased or obtained by the salvage business.
 - b. the seller or provider and their last known address.
 - c. whether the item contained any fluid or fluid residues when purchased or obtained.
 - d. what was done with the fluid or fluid residues.
 - e. whether the item was a PCB electrical transformer or PCB electrical capacitor.
 - f. if the item was not a PCB electrical transformer or PCB electrical capacitor, what it was, and your reason for believing that it contained or might have contained PCBs, or had PCBs on its surfaces.
21. Provide a copy of each document in your possession that documents the above transactions.

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22. If the transactions are very numerous, you may condense the information you provide to group together all transactions with a particular company or individual during a particular period.
23. To the best of your knowledge, what environmental or other precautions, if any, were taken by you as landowner, or by the companies or businesses operating at the site, to insure compliance with the Toxic Substances Control Act, which regulates PCBs, including their disposal, to insure compliance with other environmental laws, and/or to avoid improper disposal of hazardous wastes? With respect to all transformers shipped to the site:
 - a. the manufacturer and serial number or the respective transformers.
 - b. the quantity of oil in each respective transformer.
 - c. the concentration of PCB contained in the transformer oil.
 - d. the purpose of the shipment (i.e., repair or resale).
 - e. the time period or periods in which these transformers were sent to the Site.
 - f. a list of transporters for each transformer, including company name, address, and telephone number.
 - g. information on prior owners of the respective transformers, including names, addresses, telephone numbers, and dates of ownership.
 - h. information on any other oil filled electrical equipment sent to the Site for disposal or treatment.
 - i. copies of any contracts, invoices, receipts, or other documents related to the transport of transformers or other oil filled electrical equipment to the Site.
 - j. a description of all legal action taken to date by the state or local government, or other regulatory authority regarding the Site.
24. Does the Company have documentation showing that PCB analyses were performed on oil-filled equipment before transportation to the Company or after receipt from the Company? If so, describe in detail the analyses performed on each item identified in the questions above, including the following:
 - a. description of analyses
 - b. date analysis was performed
 - c. name of the person who conducted the analysis, and
 - d. results of the analysis.
25. Has the Company ever rejected any equipment sent by another company to the Site? If so, provide details of each such occurrence including the following:
 - a. reason for rejection
 - b. type of equipment rejected, and
 - c. date of occurrence.
26. Has Company W ever rejected any equipment sent from Company X to your facility? If so, provide details sought in the question above.
27. During the time period Company X conducted business with Company Y, did Company X have any knowledge of Company Y's handling practices of materials containing PCBs? If so, describe all such practices in detail.